

EXHIBIT B

Dennis Batchelder
President and CEO, Anti-Malware Testing Standards Organization
Anti-Malware Testing Standards Organization Inc.
325 Sharon Park Dr., #460
Menlo Park, CA 94025
USA

www.amtso.org

RE: Letter of Intent

Dear Dennis,

NSS Labs and other testing laboratories would like to express our concerns regarding the current AMTSO Draft Standard and to let you know that we will be voting against the adoption of this document.

The mission of testers in the IT security industry is to advance transparency and accountability within the cybersecurity industry. We believe testing standards should not be exclusively for testing labs or exclusively for vendors but rather should be standards that are both transparent and objective and that apply to all parties. We believe that standards should apply to the details of the test, not the operation of the business of testing. We believe that this is not the case with the current AMTSO Draft Standard. We believe that the Draft Standard favors vendors and puts the burden squarely on testing labs. A standard that attempts to dictate how a business must operate is untenable.

Instead of using the Draft Standard to improve product offerings and protect the end user, vendors have repeatedly used it as a tool to demonstrate their dissatisfaction with tests where they have underperformed or with test results that they have been unable to use to support their marketing claims. Although the Draft Standard calls for testers to test any solution, it does little to ensure that vendors cannot block or prevent testers from procuring the product to conduct a test, nor does it prevent vendors from intentionally sabotaging a test. We have observed that the AMTSO forum (currently dominated by vendors) has on more than one occasion attempted to limit what a test may validate and how a test organization may engage. In short, AMTSO is being used to set the terms by which a test can be conducted instead of being used to set the standards that products should be expected to meet.

We believe the ultimate goal of the AMTSO Standards project will never be achieved since the Draft Standard does not enforce vendor participation in tests. This means vendors can and will continue to select only those tests and test results that support their marketing claims and are performed in the way they dictate.

The Draft Standard does little to regulate tests conducted outside the AMTSO organization. There is always the possibility that non-compliant testing organizations will claim to conduct AMTSO-compliant tests and will market their test results as such, and this will cause brand dilution for other reputable testing organizations that do adhere to the AMTSO Standards. We do not believe AMTSO has the capability to enforce compliance with its Standards. Accordingly, we have decided to immediately withdraw from the standards working group and encourage AMTSO to seek more productive and balanced approaches that can achieve similar goals.

Finally, we believe that a good test is one that is accurate, rigorous, and unbiased. The goal is to provide consumers with relevant information that they can use to make decisions. The test should not be a rubber stamp that enables vendors to sell their products. When we engaged with AMTSO to draft a standard, it was our belief that AMTSO was seeking to achieve the same goal. The Draft Standard as it is currently constructed does not help

ensure that a test is good. Rather, the current AMTSO Draft Standard appears to go the other way and requires practices that will result in bad tests.

For the above-mentioned reasons and more, NSS Labs along with AV-Comparatives, MRG-Effitas, AV-Test, SKD Labs, and ICSA Labs recommends that AMTSO reframes its current Standards as principles and/or recommended guidelines.

Respectfully,
NSS Labs